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May 1, 2013

Via Electronic Case Filing (ECF)

Hon. Victor V. Pohorelsky, U.S.M.J.
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Precision Associates, et. al. v. Panalpina, et. al.*
Case No.: 08-cv-0042 (JG)(VVP)
Our File No.: 966-7

Dear Magistrate Judge Pohorelsky:

We are attorneys for Dachser GmbH & Co. KG ("Dachser") in the above-referenced matter. Please accept this letter as Dachser's request to join motions filed on behalf of all Defendants prior to Dachser's waiver of service of summons and complaint in this case.

Pursuant to the Court's directive at the March 7, 2013 Status Conference, Defendants were to submit a memorandum in opposition to the production to Plaintiffs of all documents produced in response to subpoenas issued by the Department of Justice ("DOJ") in connection with its criminal investigations concerning freight forwarding activities. As such, on March 21, 2013, Defendants, except for the DHL Defendants, filed a joint letter opposing such a production. *See* Dkt. No. 742. In addition, many Defendants filed short supplemental letters to address issues unique to them. As Dachser had not at that time been served with the Third Amended Complaint, Dachser neither joined Defendants' joint letter nor submitted its own supplemental letter in opposition to production of the DOJ materials.

Thereafter, on April 24, 2013, Dachser executed a waiver of service of the Third-Amended Complaint.

Dachser now requests the Court's permission to join Defendants' joint letter opposing production of the DOJ materials.


The undersigned has conferred with Plaintiffs' counsel, and they consent to this request.



Very truly yours,

CARROLL, McNULTY & KULL, LLC

By:



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cc: All counsel of record (via ECF)